

# SMITH | VILLAZOR

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December 2, 2021

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goettsche, et al.*, 19-CR-877 (CCC)  
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goettsche. We respectfully move to modify his bail conditions to allow Mr. Goettsche to travel to the Southern District of New York in December for in-person meetings with the undersigned counsel. The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goettsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services" and restricts his travel to the District of Colorado and the District of New Jersey. On October 18, 2021, the Court approved two trips to the Southern District of New York in November, but Mr. Goettsche took only one trip in November (dkt. 225).

The proposed modifications to the Court's Orders follow the previous approved conditions:

- Detailed travel itineraries shall be provided to Pretrial Services for review and approval in advance of any travel.
- Mr. Goettsche shall remain in the presence of Danielle Goettsche, his wife and third-party custodian or Sandy Crain, his other third-party custodian, during travel and while in New York except during in-person meetings with attorneys at either Kobre & Kim LLP, 800 Third Avenue, New York, New York or Smith Villazor LLP, 250 West 55<sup>th</sup> Street, New York, New York.
- Mr. Goettsche shall otherwise remain at the hotel in the presence of Ms. Goettsche or Ms. Crain during the duration of the trips under all applicable bail conditions.

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Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
SMITH VILLAZOR LLP

cc: Andrew Lourie, Esq.  
Benjamin Sauter, Esq.  
Amanda Tuminelli, Esq.  
Government counsel of record (via ECF and e-mail)  
U.S. Pretrial Services Officer David Hernandez (via e-mail)  
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)